



April 1, 2022

Jim Delaney
Director, Uranium and Radioactive Waste Division
Electricity Resources Branch
Natural Resources Canada

Submitted by email: radwastereview-examendechetsradioactifs@nrcan-rncan.gc.ca Letter /
NRCAN

Subject: Feedback on the draft Policy for Radioactive Waste Management and
Decommissioning

Dear Mr. Delaney,

The purpose of this letter is to provide EnergySolutions' (ES) written feedback on the *Draft for Public Comment on Modernizing Canada's Policy for Radioactive Waste Management and Decommissioning* published on February 1, 2022, by NRCAN.

EnergySolutions is committed to the importance of nuclear energy as a non-emitting source of energy playing an important role in meeting climate targets and achieving a net-zero emissions economy by 2050. As an industry leader in nuclear waste management and decommissioning, EnergySolutions wishes to express its support for the Policy modernization process and continuous development of industry best practices within Canada in addition to meeting its international commitments and obligations.

Over the past several years, the Canadian Nuclear industry, including provincial and federal ministries and agencies, have been promoting Pan-Canadian and international collaborations. A recent highlighted example includes SMR developments, licensing and envisioned national and international deployments. Canadian governments and industry have all recognized the significant global market opportunities. A similar international leadership position could be achieved through an effective implementation of a modernized, integrated, and forward-thinking Policy for Radioactive Waste Management and Decommissioning, with supporting legislations and regulations.

EnergySolutions provides industry solutions that support the prevention and minimization of nuclear waste, including the 3R Principal of Reducing, Reusing and Recycling as far as



practicable, ensuring the health, safety and security of people and environment, within an economical and sustainable manner.

EnergySolutions presently provides many of these solutions to the Canadian nuclear industry. EnergySolutions owns and operates unique specialty processing facilities in the United States. These facilities accept a range of Canadian nuclear materials for recycle and waste for volume reduction. Volume reduced waste streams are returned to Canada to the appropriate customer to await future permanent disposal. Other materials (i.e., metals) may be processed and reused within the nuclear industry. EnergySolutions has been providing these services to the Canadian nuclear industry for 10 years without incident.

EnergySolutions would respectfully request that the Government of Canada not restrict the exportation of radioactive materials and waste which could be accepted for processing and volume reduction in the United States allowing Canadian nuclear facilities to reduce their nuclear footprint and meet waste reduction goals. Similar processing facilities located in Canada would not be economically feasible unless the importation of international waste were permitted.

EnergySolutions also supports without any hesitation the integrated involvement and partnerships with First Nations, Inuits and Metis communities and peoples within a fully integrated nuclear industry. Co-management of nuclear industry opportunities could only benefit from joint western engineering technics and Indigenous Knowledge approaches.

In closing, EnergySolutions wishes to commend the Government of Canada for its pro-active approach in reviewing the *Policy for Radioactive Waste Management and Decommissioning* and would like to encourage positive changes that will help the nuclear industry thrive locally, nationally, and internationally in the development for health advancements and mitigation of climate change effects.

Respectfully,

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EnergySolutions

